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LISA RAAGAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

LISA RAAGAS, an individual,

Plaintiff,

vs.

THE SKID ROW HOUSING TRUST, a
California Non-Profit Public Benefit
Corporation; PATRICK SPILLANE, an
individual; and DOES 1 through 50,
inclusive,

Defendants.

Case No. **22STCV33763**

COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF

1. DISCRIMINATION BASED UPON SEX AND/OR GENDER IN VIOLATION OF THE FEHA – GOVT. CODE §§ 12940 *et seq.*;
2. HARASSMENT IN VIOLATION OF THE FEHA – GOVT. CODE §§ 12940 *et seq.*;
3. RETALIATION IN VIOLATION OF THE FEHA – GOVT. CODE §§ 12940 *et seq.*;
4. FAILURE TO PREVENT DISCRIMINATION AND RETALIATION IN VIOLATION OF THE FEHA – GOVT. CODE §§ 12940 *et seq.*;
5. RETALIATION IN VIOLATION OF THE CAL. LABOR CODE § 1102.5; and
6. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

[DEMAND FOR JURY TRIAL]

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1 Plaintiff Lisa Raagas (“Ms. Raagas” or “Plaintiff”) alleges the following based on knowledge as
2 to herself and her known acts, and on information and belief as to all other matters:

3 **I.**

4 **FACTS**

5 1. While this case is brought on behalf of one person – the former Chief Executive Officer
6 (“CEO”) of The Skid Row Housing Trust (the “Trust”) – it has ramifications well beyond her individual
7 experience. This case arises out of the Trust’s repeated and intentional **failures over several years to**
8 **show basic respect and equal treatment for women in the workplace.** Indeed, despite all the good
9 work that the Trust has done for the Los Angeles community over the past three decades, the Trust’s
10 history and legacy is critically marred by **gender and sex discrimination, harassment and retaliation**
11 that has persisted to the present. Such wrongful acts have been carried out, and ratified, by individuals
12 at the highest level of the Trust – the Board of Directors. Those Board Directors most responsible for
13 the illegal acts remain in power today.

14 2. For several years, the Chair of the Board of Directors (the “Board”), Executive
15 Committee (the “EC”) and Real Estate Development Committee (the “REDC”) for the Trust was Patrick
16 Spillane, a prominent commercial real estate developer. During his tenure as Board Chair, and thereafter
17 continuing as Board Director and REDC Chair, Mr. Spillane cultivated a **culture of hostility towards**
18 **women** that was consistently sanctioned by the Board. While sitting in the position of Board Chair, he
19 would openly talk derogatorily about senior female executives of the Trust, describing them in meetings
20 as “**crazy bitches**” and “**shit shows**”. In one meeting, he asked who was “**wearing the strap on**” as
21 between two female decision makers, one of whom was a Trust female leader. When female executives
22 of the Trust were accused of making mistakes to the detriment of the Trust, Mr. Spillane would say
23 things like “**we’re getting bent over**” or “**we’re having to take it from behind**”. Mr. Spillane would
24 make these sorts of comments openly to executives and Board members in formal and informal meetings.
25 In 2018, when a female executive expressed disappointment that she was being passed over for
26 promotion to the CEO position (despite the fact that she had been identified as a potential successor for
27 such role), Mr. Spillane told her that she was immature and “**too emotional**” because she was a woman,
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1 and indicated that it was the opinion of a few Board members she may not have gotten the position in
2 part because she was a mother with small children. Mr. Spillane also had a history of talking down to,
3 yelling at, and communicating hostility to women, and of contacting the subordinates of key female
4 executives to try to collect non-performance feedback and “dirt” on them.

5 3. During his tenure with the Trust, Mr. Spillane and the Board repeatedly treated women
6 materially worse than their male counterparts. The Trust passed female leaders over for promotion and
7 chose males instead. The Trust also treated female executives differently upon separation. In multiple
8 instances, the Trust chose to ignominiously terminate female executives while allowing male executives,
9 including prior CEOs, to “sunset” their employment and continue through the remainder of their
10 respective contract terms even though their actions were similar or worse than those taken by the women
11 who were terminated.

12 4. Multiple employees and Board members – both male and female – protested repeatedly
13 over the years about Mr. Spillane’s sexism and the Trust’s willingness to look the other way. Yet, many
14 who complained about Mr. Spillane ultimately were terminated, forced out or resigned in protest, while
15 Mr. Spillane and those who appeased him, remained in power.

16 5. This included Tonja Boykin, former Chief Operating Officer (“COO”) for the Trust. Mr.
17 Spillane was patently hostile to Ms. Boykin during her employment, and everyone in the Trust’s C-suite
18 recognized such hostility. In fact, it was an open and regular topic of conversation among the Trust’s C-
19 suite executives, including CEO Mike Alvidrez, Chief Administration Officer Monique Davis, and Chief
20 Real Estate Officer (“CRO”) Dana Trujillo, that Mr. Spillane was targeting Ms. Boykin and that he had
21 a problem with her and other female leaders. Ms. Boykin later complained about the hostile and
22 discriminatory work environment for women created by Mr. Spillane. The Trust terminated Ms.
23 Boykin’s employment within months of receiving her protected complaint.

24 6. This also included Dana Trujillo, former CRO for the Trust. In 2018, the Trust passed
25 Ms. Trujillo over for promotion to the CEO position in favor of a male individual who was brought in
26 from outside the organization despite Trujillo’s qualifications while simultaneously offering her a CEO
27 position in a start up concept under the Trust called Trust Innovation sending a mixed message of her
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1 capabilities and the Board's assessment of such. Ms. Trujillo had previously complained about the
2 hostile and discriminatory work environment for women created by Mr. Spillane. The Trust terminated
3 Ms. Trujillo's employment within months of receiving her protected complaint.

4 7. This also included multiple Board members who resigned in protest due to the Board's
5 unwillingness to remediate the hostile work environment against women.

6 8. This also included Lisa Raagas, former CEO for the Trust and the Plaintiff in this case.
7 Ms. Raagas raised awareness to the Board of a critical concern of a state agency that was traced back to
8 decisions made in 2018, and identified the need to hold the decision makers – including Mr. Spillane –
9 accountable for the consequences being outlined by that state agency. In her communications, Ms.
10 Raagas complained about the hostile and discriminatory environment for women created by Mr. Spillane
11 and the Board, particularly after it was clear that Mr. Spillane and other male leaders would not be held
12 accountable for decisions they were responsible for in 2018. Like the others before her, the Trust
13 terminated Ms. Raagas' employment within months of receiving her protected complaint.

14 ***About The Trust***

15 9. The Trust is a prominent non-profit corporation founded in 1989 to develop, renovate and
16 manage affordable housing projects, and provide related supportive services, for low-income and
17 formerly, chronically homeless individuals. The Trust holds a portfolio of approximately 2700 studio
18 type Apartments and Single Resident Occupancy ("SRO") Apartments that are primarily located in an
19 area just east of downtown Los Angeles referred to as "Skid Row". The area is considered an epicenter
20 for homeless individuals. The economic and financial structures of those properties are structured as
21 Low Income Housing Tax Credits designed for tax credit or passive loss benefits.

22 10. The Trust is overseen by a Board of Directors (the "Board") which has fluctuated in size
23 over the years from as few as ~13 to as many as ~20 Directors.

24 11. From 2014 until in or around September 2019, Mr. Spillane served as Chair of the Board
25 and two other key decision making committees for the Trust. Spillane is Senior Vice President,
26 Community Affairs for IDS Real Estate Group, a commercial real estate company.

27 12. In or around September 2019, Simon Ha, Managing Partner of the Los Angeles office of
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1 architectural firm Steinberg Hart, replaced Mr. Spillane as Board Chair. At such time, Mr. Spillane
2 returned to the position of Director but maintained the position of Chair of the REDC and all associated
3 responsibilities for real estate development and asset management.

4 13. As of the current date, Mr. Ha remains the Chair of both the Board and the EC, and Mr.
5 Spillane remains a Board Director as well as Chair of the REDC.

6 ***About Plaintiff***

7 14. Plaintiff is an experienced real estate mortgage leader and executive. Her career in real
8 estate spans over 30 years and includes working in C-level positions at multiple companies. She spent
9 over 10 years at a major mortgage company that ultimately became part of H&R Block, eventually
10 serving as the company's Chief Strategy Officer. She later worked for 4-5 years as Chief Business
11 Development Officer for a real estate and financial technology company. She also spent several years
12 providing consulting services to senior level executives at multiple real estate, financial and asset
13 management companies.

14 15. Plaintiff performed worked for the Trust for nearly 6 years, starting around July 2015
15 through February 2022. For the period from around July 2015 through December 2017, Plaintiff worked
16 for the Trust as a consultant focused on growth and public funding changes. In or around January 2018,
17 Plaintiff was appointed interim COO of the Trust, although she continued to be classified as an
18 independent contractor until around July 2018, at which time she was converted to a full time employee
19 upon her request. In or around July 2019, Plaintiff was appointed to the position of interim CEO.
20 Plaintiff remained in the position of interim CEO until she was terminated in March 2022.

21 ***Plaintiff's Work Performance***

22 16. Throughout her tenure with the Trust, Plaintiff met or exceeded all objective expectations,
23 never received any write-ups, performance improvement plans, written or verbal warnings or other
24 discipline, and regularly received positive feedback from other Trust executives as well as members of
25 the Board.

26 17. Each of the times Plaintiff's job position changed – first from consultant to interim COO,
27 and then from interim COO to interim CEO, Plaintiff received a pay increase reflective of her
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1 increasingly more senior roles and positive performance that matched the salary ranges and
2 compensation of her predecessors' agreed upon terms.

3 18. In her first year as CEO, Plaintiff had to deal with a number of crises, the most important
4 of which was Covid-19. Plaintiff had to manage PPP loans, PPE distribution, vaccination distribution,
5 donation and supply chain management to serve the basic needs of SRO residents / tenants, Department
6 of Public Health quarantines at the Trust's properties, and other matters. These duties were in addition
7 to the numerous other duties that were expected of the role as interim CEO of the Trust. Despite such
8 challenges, Plaintiff and her team did a great job under the circumstances stabilizing the health and safety
9 of the organization and continuing normal operations of real estate development during the pandemic.

10 ***The Trust Becomes an "Ineligible Sponsor"***

11 19. In or around Spring 2021, nearly two years into Plaintiff's tenure as interim CEO, the
12 California Department of Housing and Community Development ("HCD") advised the Trust of concerns
13 it had regarding a rehabilitation project for a building commonly known as the "Edward Hotel". The
14 Trust was in the process of commencing a project to tear the building down and rebuild it, and the Trust
15 was seeking the greenlight from HCD to move forward. HCD's communication of such concerns was in
16 the midst of the Trust's attempt to start the teardown. However, the concerns raised by HCD centered
17 around a 2018 decision by the Trust to vacate the property by relocating its residents to a new building
18 project called the "Simone". During that process in 2018, the Trust misused relocation and operational
19 funds by vacating the Edward Hotel without the consent of HCD.

20 20. At the time that such 2018 actions were approved, Plaintiff had no authority over such
21 actions. Instead, such actions were carried out by others on the executive team as overseen by Mr.
22 Spillane, among others on the Board. At the time, Mr. Spillane was technically, pursuant to the Trust's
23 formal Bylaws, the Chief Executive Officer of the Trust, the Chair of the Board, the Chair of the Board's
24 Executive Committee, and the Chair of the Board's Real Estate Development Committee. Thus, it was
25 ultimately the responsibility of Spillane, along with other Board members, to provide oversight with
26 regard to the Trust's 2018 decisions at issue, and there were clearly material failures by Spillane and
27 other Board members in respect to such oversight.

1 21. Regardless of who was to blame for the failures that took place in 2018, Plaintiff and her
2 executive team worked diligently over the next several months trying to appease HCD and to address a
3 list of items that HCD demanded be cured. Unfortunately, one of HCD's demands was that the Trust
4 engage in "lease up" efforts to ensure there were residents occupying the Edward Hotel and that the
5 building was put back in use – a demand that the Trust could not realistically accomplish, particularly
6 within the timeframe sought by HCD and given the circumstances of the vacated building which included
7 no elevator and no air conditioning.

8 22. Due to the fact that the Trust was unable to satisfy all of HCD's demands, HCD
9 designated the Trust an "Ineligible Sponsor" in September 2021. Due to such designation, the Trust was
10 prohibited from engaging in real estate development activities (which became clear when the HCD
11 denied real estate development funding in response to an application the Trust subsequently submitted
12 to HCD) and it also included potentially adverse affects with respect to their managing of existing
13 properties under their assets under management and Limited Partner requirements.

14 23. In or around October 2021, Plaintiff sought, on behalf of the Trust, an appeal or
15 submission process to dispute the "Ineligible Sponsor" status, but Plaintiff was notified there was no
16 HCD appeal process.

17 24. HCD's decision to designate the Trust an "Ineligible Sponsor" had significant financial
18 and operational ramifications for the Trust and its ability to be successful in its current state, and raised
19 questions about the Trust's future viability.

20 ***Plaintiff's Protected Complaints***

21 25. Given the ultimate responsibility of Mr. Spillane and the Board for such failures,
22 combined with Mr. Spillane's history of statements and his and the Board's discriminatory treatment of
23 women, Ms. Raagas complained to members of the Board in January 2022 that it was time that Mr.
24 Spillane and the Board be held accountable.

25 26. Plaintiff made multiple protected complaints of this nature, including both oral and
26 written complaints, in or around January 2022. These complaints specifically identified Plaintiff's
27 concerns regarding differential treatment between male and female executives, and reminded members
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1 of the Board about prior complaints by women regarding the hostile work environment created by Mr.
2 Spillane and the Board.

3 27. Rather than addressing Plaintiff's complaints or otherwise taking them seriously,
4 members of the Board, including Board Chair Simon Ha, informed Plaintiff that the Board had no
5 intention to discipline or otherwise hold Mr. Spillane responsible. Instead, the Board left Plaintiff
6 exposed to face the brunt of the blame and flack from HCD, and took no action to hold Spillane and
7 other male leaders responsible.

8 28. On March 17, 2022, Mr. Ha and another Board member contacted Plaintiff and sought
9 her resignation, noting that the Trust needed new leadership in order to ensure the well-being and safety
10 of residents. Plaintiff refused to resign.

11 29. On March 17, 2022, the Trust emailed Plaintiff to inform her that she was being
12 terminated. On March 21, 2022, human resources for the Trust contacted Plaintiff to let her know that
13 her termination would be effective that same day.

14 ***Plaintiff's Personal Experience with Mr. Spillane and the Board***

15 30. During Ms. Raagas tenure with the Company, Spillane repeatedly made sexist and/or
16 sexual comments to and in front of her. He publicly berated female executives both in and outside of her
17 presence. Ms. Raagas repeatedly received complaints from other female executives about Spillane's
18 sexism. When she reported these complaints to Board members other than Spillane, they would try to
19 defend Spillane's actions as being attributed to Mr. Spillane's "Irish temper" but refused to accept the
20 reality that his actions were sexist. Instead, the Board repeatedly took the position that "it's not illegal
21 to be an asshole" and simply looked the other way, despite multiple women complaining that he carried
22 animus towards women.

23 31. In 2019, newly appointed Board Chair Simon Ha expressly told Plaintiff that Spillane did
24 not like or trust her. When Plaintiff asked Mr. Ha why he felt that way, Ha stated that "Patrick has
25 challenges with women and blames you for how he was transitioned out of his Board Chair position".

26 32. Shortly after the Trust notified Ms. Trujillo that she was being terminated from
27 employment with the Trust, Ms. Trujillo warned Plaintiff: "You know, you're next".
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33. In late 2021 through early 2022, while Plaintiff was complaining about Mr. Spillane's scope of authority as it related to the 2018 failures to other Board members, Mr. Spillane became increasingly caustic and defensive with Plaintiff. It was clear that Mr. Spillane decided to blame Plaintiff for his and the Board's own mistakes rather than take responsibility. In light of the manner in which the Board had protected Mr. Spillane over the past several years, the Board unsurprisingly took his side.

Purpose of This Complaint

34. Like other strong female leaders before her, Plaintiff was unceremoniously fired in retaliation for her protected complaints. She was also subjected to a hostile work environment caused by Mr. Spillane and authorized by the Board, and was treated differently than male executives with respect to the circumstances of her departure.

35. This Complaint seeks changes necessary at the Trust so that no other woman is mistreated the way that Plaintiff and other women have been treated. It also seeks compensation for the harm suffered by Plaintiff and punitive damages to ensure that this will never happen again.

II.

PARTIES

36. At the relevant times mentioned herein, Plaintiff was employed by the Trust. Plaintiff performed work for the Trust in Los Angeles County, California. The unlawful conduct alleged herein occurred in whole or significant part in Los Angeles County, California.

37. At the relevant times mentioned herein, the Trust was a Non-Profit Public Benefit Corporation conducting business in Los Angeles County, with its principal place of business in Los Angeles County.

38. At the relevant times mentioned herein, Mr. Spillane was a Board member of the Trust performing work for the Trust within Los Angeles County. Plaintiff is informed and believes that Mr. Spillane is, and at the relevant times mentioned herein was, a resident of Los Angeles County or Santa Barbara County.

39. At the relevant times mentioned herein, the Trust was an “employer” of Plaintiff as such term is defined by California Government Code section 12926(d), in that it regularly employed five (5)

1 or more persons. As such, the Trust was subject to the California Fair Employment and Housing Act
2 (the “FEHA”).

3 40. Plaintiff is ignorant of the true names and capacities of defendants sued herein as Does 1
4 through 50, inclusive, and therefore sues these defendants by such fictitious names. Plaintiff will amend
5 this complaint to allege the true names and capacities of said defendants when the same has been
6 ascertained. Each of the fictitiously named defendants is responsible in some manner for the acts
7 complained of herein. Unless otherwise stated, all references to named defendants shall include Doe
8 defendants as well.

9 **III.**

10 **JURISDICTION AND VENUE**

11 41. Jurisdiction and venue are proper in this Court because all of the claims alleged herein
12 arose in Los Angeles County and all of the defendants are doing or did business in Los Angeles County,
13 and/or their principal place of business is in Los Angeles County, in each case, at the times relevant
14 herein. *See also* Govt. Code § 12965(b) (stating venue is appropriate in, *inter alia*, any county in the
15 state in which the unlawful practice is alleged to have been committed).

16 42. The amount in controversy in this matter exceeds the sum of \$25,000.00, exclusive of
17 interest and costs.

18 **IV.**

19 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

20 43. Prior to the initiation of this lawsuit, Plaintiff filed a complaint against each named
21 defendant with the California Department of Fair Employment and Housing (“DFEH”) pursuant to
22 section 12900 *et seq.* of the California Government Code, alleging the claims described in this
23 Complaint. On October 17, 2022, the DFEH issued a “right to sue” letter. True and correct copies of
24 the administrative complaint and the “right to sue” letter are attached hereto collectively as **Exhibit A**.
25 All conditions precedent to the institution of this lawsuit have been fulfilled. This action is filed within
26 one year of the date that the DFEH issued its right to sue letter.

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1 V.

2 **FIRST CAUSE OF ACTION**

3 **(Discrimination Based Upon Sex and/or Gender in Violation of the FEHA)**

4 **(On Behalf of Plaintiff Against the Trust)**

5 44. Plaintiff realleges and incorporates by reference paragraphs 1-43, inclusive, of this
6 Complaint as though fully set forth herein.

7 45. As explained in paragraphs 1-35 above, the Trust discriminated against Plaintiff based in
8 on her sex and/or gender in violation of the FEHA through numerous illegal acts, including, without
9 limitation, the termination of her employment, as well as the failure to adequately and promptly
10 investigate and address her protected complaints.

11 46. As a proximate result of the Trust's conduct, Plaintiff suffered and continues to suffer
12 damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss according to proof.
13 Plaintiff has also suffered and will continue to suffer physical and emotional injuries, including, but not
14 limited to, nervousness, humiliation, depression, anguish, embarrassment, shock, pain, discomfort,
15 fatigue, and anxiety. The amount of Plaintiff's damages will be ascertained at trial.

16 47. The Trust's conduct, as described in paragraphs 1-35 above, was performed or ratified by
17 managing agents of the Trust, including, without limitation, Mr. Spillane and Mr. Ha (collectively, the
18 "Managing Agents"). The Managing Agents were each responsible for overseeing a substantial portion
19 of the Trust's business operations, and each exercised substantial discretionary authority over vital
20 aspects of such operations including making significant decisions that affect the Trust's internal policies.
21 The Managing Agents engaged in malicious, fraudulent, and oppressive conduct that justifies an award
22 of punitive damages.

23 48. In committing the foregoing acts as set forth above in paragraphs 1-35 above, the
24 Managing Agents willfully disregarded Plaintiff's rights to be free from unlawful discrimination,
25 harassment and/or retaliation. Among other things, the Managing Agents discriminated and retaliated
26 against Plaintiff based on her sex and/or gender and complaints related thereto, and the Trust failed to
27 prevent such discrimination, harassment and retaliation despite Plaintiff's and others' complaints about
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1 such treatment.

2 49. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
3 Agents acted despicably and subjected Plaintiff to cruel and unjust hardship in conscious disregard for
4 her rights under California law. By way of example, the Managing Agents discriminated and retaliated
5 against Plaintiff to intentionally cause her harm because the Managing Agents wanted to punish her for,
6 *inter alia*, complaining about Spillane's and the Trust's unlawful conduct. This is evidenced by the fact
7 that Plaintiff and others voiced their concerns to the Trust about the way they were being treated by
8 Spillane and how the Trust was discriminating against women, but their concerns were ignored and their
9 employments were later terminated for pretextual reasons. The Managing Agents' conduct demonstrates
10 a callous indifference for the law and Plaintiff's and others' rights.

11 50. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
12 Agents intended to cause emotional and financial injury to Plaintiff. Specifically, the Managing Agents
13 ultimately terminated Plaintiff's employment with the intent to cause her severe emotional distress or at
14 least without regard for the consequences on Plaintiff's career, livelihood, and emotional wellbeing.

15 51. The FEHA provides for an award of reasonable attorneys' fees and costs incurred by a
16 prevailing plaintiff in an action brought under its provisions. Plaintiff has employed and will continue
17 to employ attorneys for the initiation and prosecution of this action. Plaintiff has incurred and will
18 continue to incur attorneys' fees and costs herein. Plaintiff is entitled to an award of attorneys' fees and
19 costs.

20 52. Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

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VI.

SECOND CAUSE OF ACTION

(Harassment Based Upon Sex and/or Gender in Violation of the FEHA)

(On Behalf of Plaintiff Against All Defendants)

53. Plaintiff realleges and incorporates by reference paragraphs 1-52, inclusive, of this Complaint as though fully set forth herein.

54. California Government Code section 12940(j)(1) makes it illegal for an employer or any person to harass an employee because of his or her sex and/or gender.

55. During the course of Plaintiff's employment, Mr. Spillane engaged in a pattern of continuous and pervasive harassment of Plaintiff and others based in part on their sex and/or gender, which acts included, but were not limited to, those alleged in paragraphs 1-35 above.

56. As a proximate result of Mr. Spillane's conduct, and the Trust's willingness to allow it to happen, Plaintiff suffered and continues to suffer damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss according to proof. Plaintiff has also suffered and will continue to suffer physical and emotional injuries, including, but not limited to, nervousness, humiliation, depression, anguish, embarrassment, shock, pain, discomfort, fatigue, and anxiety. The amount of Plaintiff's damages will be ascertained at trial.

57. At all times relevant to this Complaint, Mr. Spillane was a "supervisor" within the meaning of California Government Code section 12926(r) because he had the authority, in the interest of the Trust, "to hire, transfer, suspend, lay-off, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to direct them, or to adjust their grievances, or to effectively recommend that action," and in connection with the foregoing was required to use independent judgment. Because Spillane was a supervisor as defined by the FEHA, the Trust is strictly liable for his acts of harassment.

58. The Trust's conduct, as described in paragraphs 1-35 above, was performed or ratified by the Managing Agents. The Managing Agents were each responsible for overseeing a substantial portion of the Trust's business operations, and each exercised substantial discretionary authority over vital

aspects of such operations including making significant decisions that affect the Trust's internal policies. The Managing Agents engaged in malicious, fraudulent, and oppressive conduct that justifies an award of punitive damages.

59. In committing the foregoing acts as set forth above in paragraphs 1-35 above, the Managing Agents willfully disregarded Plaintiff's rights to be free from unlawful discrimination, harassment and/or retaliation. Among other things, the Managing Agents discriminated and retaliated against Plaintiff based on her sex and/or gender and complaints related thereto, and the Trust failed to prevent such discrimination, harassment and retaliation despite Plaintiff's and others' complaints about such treatment.

60. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing Agents acted despicably and subjected Plaintiff to cruel and unjust hardship in conscious disregard for her rights under California law. By way of example, the Managing Agents discriminated and retaliated against Plaintiff to intentionally cause her harm because the Managing Agents wanted to punish her for, *inter alia*, complaining about Spillane's and the Trust's unlawful conduct. This is evidenced by the fact that Plaintiff and others voiced their concerns to the Trust about the way they were being treated by Spillane and how the Trust was discriminating against women, but their concerns were ignored and their employments were later terminated for pretextual reasons. The Managing Agents' conduct demonstrates a callous indifference for the law and Plaintiff's and others' rights.

61. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing Agents intended to cause emotional and financial injury to Plaintiff. Specifically, the Managing Agents ultimately terminated Plaintiff's employment with the intent to cause her severe emotional distress or at least without regard for the consequences on Plaintiff's career, livelihood, and emotional wellbeing.

62. The FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provisions. Plaintiff has employed and will continue to employ attorneys for the initiation and prosecution of this action. Plaintiff has incurred and will continue to incur attorneys' fees and costs herein. Plaintiff is entitled to an award of attorneys' fees and costs.

63. Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

VII.

THIRD CAUSE OF ACTION

(Retaliation in Violation of the FEHA)

(On Behalf of Plaintiff Against the Trust)

64. Plaintiff realleges and incorporates by reference paragraphs 1-63, inclusive, of this Complaint as though fully set forth herein.

65. California Government Code section 12940(h) makes it an unlawful employment practice for an employer to “discharge, expel, or otherwise discriminate against any person because the person has opposed any practices forbidden under [the FEHA] or because the person has filed a complaint, testified, or assisted in any proceeding under [the FEHA].”

66. As set forth in paragraphs 1-35 above, Plaintiff complained about unlawful discrimination, harassment and retaliation that is prohibited by the FEHA to members of the Board of the Trust. In response, the Trust retaliated against Plaintiff for engaging in that protected activity by, among other things, terminating Plaintiff’s employment, as well as failing to adequately and promptly investigate and address Plaintiff’s discrimination, harassment and retaliation complaints.

67. As a proximate result of the Trust’s conduct, Plaintiff suffered and continues to suffer damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss according to proof. Plaintiff has also suffered and will continue to suffer physical and emotional injuries, including, but not limited to, nervousness, humiliation, depression, anguish, embarrassment, shock, pain, discomfort, fatigue, and anxiety. The amount of Plaintiff’s damages will be ascertained at trial.

68. The Trust’s conduct, as described in paragraphs 1-35 above, was performed or ratified by the Managing Agents. The Managing Agents were each responsible for overseeing a substantial portion of the Trust’s business operations, and each exercised substantial discretionary authority over vital aspects of such operations including making significant decisions that affect the Trust’s internal policies. The Managing Agents engaged in malicious, fraudulent, and oppressive conduct that justifies an award of punitive damages.

69. In committing the foregoing acts as set forth above in paragraphs 1-35 above, the Managing Agents willfully disregarded Plaintiff's rights to be free from unlawful discrimination, harassment and/or retaliation. Among other things, the Managing Agents discriminated and retaliated against Plaintiff based on her sex and/or gender and complaints related thereto, and the Trust failed to prevent such discrimination, harassment and retaliation despite Plaintiff's and others' complaints about such treatment.

70. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing Agents acted despicably and subjected Plaintiff to cruel and unjust hardship in conscious disregard for her rights under California law. By way of example, the Managing Agents discriminated and retaliated against Plaintiff to intentionally cause her harm because the Managing Agents wanted to punish her for, *inter alia*, complaining about Spillane's and the Trust's unlawful conduct. This is evidenced by the fact that Plaintiff and others voiced their concerns to the Trust about the way they were being treated by Spillane and how the Trust was discriminating against women, but their concerns were ignored and their employments were later terminated for pretextual reasons. The Managing Agents' conduct demonstrates a callous indifference for the law and Plaintiff's and others' rights.

71. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing Agents intended to cause emotional and financial injury to Plaintiff. Specifically, the Managing Agents ultimately terminated Plaintiff's employment with the intent to cause her severe emotional distress or at least without regard for the consequences on Plaintiff's career, livelihood, and emotional wellbeing.

72. The FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provisions. Plaintiff has employed and will continue to employ attorneys for the initiation and prosecution of this action. Plaintiff has incurred and will continue to incur attorneys' fees and costs herein. Plaintiff is entitled to an award of attorneys' fees and costs.

73. Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

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VIII.

FOURTH CAUSE OF ACTION

(Failure to Prevent Discrimination, Harassment and Retaliation in Violation of FEHA)

(On Behalf of Plaintiff Against the Trust)

74. Plaintiff realleges and incorporates by reference paragraphs 1-73, inclusive, of this Complaint as though fully set forth herein.

75. California Government Code section 12940(k) makes it an unlawful employment practice for an employer to “fail to take all reasonable steps to prevent discrimination and harassment from occurring.” This provision also makes it unlawful for an employer to fail to prevent retaliation. *See, e.g., Ortiz v. Georgia Pacific* (E.D. Cal. 2013) 973 F.Supp.2d 1162, 1184 (citing *Taylor v. City of Los Angeles Dep’t of Water & Power* (2006) 144 Cal.App.4th 1216, 1240). The Trust violated this provision by failing to prevent discrimination, harassment and retaliation against Plaintiff, including those acts described in paragraphs 1-35 above. Specifically, the Trust knew or should have known of the discrimination, harassment and retaliation against Plaintiff and other female employees, yet failed to take any prompt remedial action. Instead, the Trust discriminated against Plaintiff by taking an adverse action against her that materially changed the terms and conditions of their employments, including the termination of her employment, as well as the failure to adequately and promptly investigate and address her discrimination, harassment and retaliation complaints.

76. As a proximate result of the Trust’s conduct, Plaintiff suffered and continues to suffer damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss according to proof. Plaintiff has also suffered and will continue to suffer physical and emotional injuries, including, but not limited to, nervousness, humiliation, depression, anguish, embarrassment, shock, pain, discomfort, fatigue, and anxiety. The amount of Plaintiff’s damages will be ascertained at trial.

77. The Trust’s conduct, as described in paragraphs 1-35 above, was performed or ratified by the Managing Agents. The Managing Agents were each responsible for overseeing a substantial portion of the Trust’s business operations, and each exercised substantial discretionary authority over vital aspects of such operations including making significant decisions that affect the Trust’s internal policies.

1 The Managing Agents engaged in malicious, fraudulent, and oppressive conduct that justifies an award
2 of punitive damages.

3 78. In committing the foregoing acts as set forth above in paragraphs 1-35 above, the
4 Managing Agents willfully disregarded Plaintiff's rights to be free from unlawful discrimination,
5 harassment and/or retaliation. Among other things, the Managing Agents discriminated and retaliated
6 against Plaintiff based on her sex and/or gender and complaints related thereto and complaints related
7 thereto, and the Trust failed to prevent such discrimination, harassment and retaliation despite Plaintiff's
8 and others' complaints about such treatment.

9 79. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
10 Agents acted despicably and subjected Plaintiff to cruel and unjust hardship in conscious disregard for
11 her rights under California law. By way of example, the Managing Agents discriminated and retaliated
12 against Plaintiff to intentionally cause her harm because the Managing Agents wanted to punish her for,
13 *inter alia*, complaining about Spillane's and the Trust's unlawful conduct. This is evidenced by the fact
14 that Plaintiff and others voiced their concerns to the Trust about the way they were being treated by
15 Spillane and how the Trust was discriminating against women, but their concerns were ignored and their
16 employments were later terminated for pretextual reasons. The Managing Agents' conduct demonstrates
17 a callous indifference for the law and Plaintiff's and others' rights.

18 80. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
19 Agents intended to cause emotional and financial injury to Plaintiff. Specifically, the Managing Agents
20 ultimately terminated Plaintiff's employment with the intent to cause her severe emotional distress or at
21 least without regard for the consequences on Plaintiff's career, livelihood, and emotional wellbeing.

22 81. The FEHA provides for an award of reasonable attorneys' fees and costs incurred by a
23 prevailing plaintiff in an action brought under its provisions. Plaintiff has employed and will continue
24 to employ attorneys for the initiation and prosecution of this action. Plaintiff has incurred and will
25 continue to incur attorneys' fees and costs herein. Plaintiff is entitled to an award of attorneys' fees and
26 costs.

27 82. Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.
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IX.

FIFTH CAUSE OF ACTION

(Retaliation in Violation of California Labor Code section 1102.5)

(On Behalf of Plaintiff Against the Company)

83. Plaintiff realleges and incorporates by reference paragraphs 1-82, inclusive, of this Complaint as though fully set forth herein.

84. California Labor Code section 1102.5, subdivision (b), make it unlawful for an employer to “retaliate against an employee for disclosing information, or because the employer believes that the employee disclosed or may disclose information, to a government or law enforcement agency, to a person with authority over the employee or another employee who has the authority to investigate, discover, or correct the violation or noncompliance ... if the employee has reasonable cause to believe that the information discloses a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation”

85. As set forth above in paragraphs 1-35 above, the Trust terminated Plaintiff’s employment shortly after, and in retaliation for, Plaintiff’s complaints about conduct which she reasonably believed violated California Government Code section 12940(a) – the Board and its’ members discriminatory and harassing treatment against women.

86. As a proximate result of the Trust’s conduct, Plaintiff suffered and continues to suffer damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss according to proof. Plaintiff has also suffered and will continue to suffer physical and emotional injuries, including, but not limited to, nervousness, humiliation, depression, anguish, embarrassment, shock, pain, discomfort, fatigue, and anxiety. The amount of Plaintiff’s damages will be ascertained at trial.

87. The Trust’s conduct, as described in paragraphs 1-35 above, was performed or ratified by the Managing Agents. The Managing Agents were each responsible for overseeing a substantial portion of the Trust’s business operations, and each exercised substantial discretionary authority over vital aspects of such operations including making significant decisions that affect the Trust’s internal policies. The Managing Agents engaged in malicious, fraudulent, and oppressive conduct that justifies an award

1 of punitive damages.

2 88. In committing the foregoing acts as set forth above in paragraphs 1-35 above, the
3 Managing Agents willfully disregarded Plaintiff's rights to be free from unlawful discrimination,
4 harassment and/or retaliation. Among other things, the Managing Agents discriminated and retaliated
5 against Plaintiff based on her sex and/or gender and complaints related thereto, and the Trust failed to
6 prevent such discrimination, harassment and retaliation despite Plaintiff's and others' complaints about
7 such treatment.

8 89. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
9 Agents acted despicably and subjected Plaintiff to cruel and unjust hardship in conscious disregard for
10 her rights under California law. By way of example, the Managing Agents discriminated and retaliated
11 against Plaintiff to intentionally cause her harm because the Managing Agents wanted to punish her for,
12 *inter alia*, complaining about Spillane's and the Trust's unlawful conduct. This is evidenced by the fact
13 that Plaintiff and others voiced their concerns to the Trust about the way they were being treated by
14 Spillane and how the Trust was discriminating against women, but their concerns were ignored and their
15 employments were later terminated for pretextual reasons. The Managing Agents' conduct demonstrates
16 a callous indifference for the law and Plaintiff's and others' rights.

17 90. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
18 Agents intended to cause emotional and financial injury to Plaintiff. Specifically, the Managing Agents
19 ultimately terminated Plaintiff's employment with the intent to cause her severe emotional distress or at
20 least without regard for the consequences on Plaintiff's career, livelihood, and emotional wellbeing.

21 91. California Labor Code section 1102.5 provides for an award of reasonable attorneys' fees
22 and costs incurred by a prevailing Plaintiff in an action brought under its provisions. Plaintiff has
23 employed and will continue to employ attorneys for the initiation and prosecution of this action. Plaintiff
24 has incurred and will continue to incur attorneys' fees and costs herein. Plaintiff is entitled to an award
25 of attorneys' fees and costs.

26 92. Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

27 **X.**

1 **SIXTH CAUSE OF ACTION**

2 **(Wrongful Termination in Violation of Public Policy)**

3 **(On Behalf of Plaintiff Against the Trust)**

4 93. Plaintiff realleges and incorporates by reference paragraphs 1-92, inclusive, of this
5 Complaint as though fully set forth herein.

6 94. As set forth in Paragraphs 1-35 above, the Trust wrongfully terminated Plaintiff's
7 employment in violation of important and well-established public policies, as set forth in various state
8 statutes and other provisions including, but not limited to, the FEHA and California Labor Code section
9 1102.5.

10 95. As a proximate result of the Trust's conduct, Plaintiff suffered and continues to suffer
11 damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss according to proof.
12 Plaintiff has also suffered and will continue to suffer physical and emotional injuries, including, but not
13 limited to, nervousness, humiliation, depression, anguish, embarrassment, shock, pain, discomfort,
14 fatigue, and anxiety. The amount of Plaintiff's damages will be ascertained at trial.

15 96. The Trust's conduct, as described in paragraphs 1-35 above, was performed or ratified by
16 the Managing Agents. The Managing Agents were each responsible for overseeing a substantial portion
17 of the Trust's business operations, and each exercised substantial discretionary authority over vital
18 aspects of such operations including making significant decisions that affect the Trust's internal policies.
19 The Managing Agents engaged in malicious, fraudulent, and oppressive conduct that justifies an award
20 of punitive damages.

21 97. In committing the foregoing acts as set forth above in paragraphs 1-35 above, the
22 Managing Agents willfully disregarded Plaintiff's rights to be free from unlawful discrimination,
23 harassment and/or retaliation. Among other things, the Managing Agents discriminated and retaliated
24 against Plaintiff based on her sex and/or gender and complaints related thereto, and the Trust failed to
25 prevent such discrimination, harassment and retaliation despite Plaintiff's and others' complaints about
26 such treatment.

27 98. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
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1 Agents acted despicably and subjected Plaintiff to cruel and unjust hardship in conscious disregard for
2 her rights under California law. By way of example, the Managing Agents discriminated and retaliated
3 against Plaintiff to intentionally cause her harm because the Managing Agents wanted to punish her for,
4 *inter alia*, complaining about Spillane's and the Trust's unlawful conduct. This is evidenced by the fact
5 that Plaintiff and others voiced their concerns to the Trust about the way they were being treated by
6 Spillane and how the Trust was discriminating against women, but their concerns were ignored and their
7 employments were later terminated for pretextual reasons. The Managing Agents' conduct demonstrates
8 a callous indifference for the law and Plaintiff's and others' rights.

9 99. In committing the foregoing acts as set forth in paragraphs 1-35 above, the Managing
10 Agents intended to cause emotional and financial injury to Plaintiff. Specifically, the Managing Agents
11 ultimately terminated Plaintiff's employment with the intent to cause her severe emotional distress or at
12 least without regard for the consequences on Plaintiff's career, livelihood, and emotional wellbeing.

13 100. Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

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1 **XI.**

2 **PRAYER FOR RELIEF**

3 1. For general damages, including emotional distress damages, according to proof on each
4 cause of action for which such damages are available.

5 2. For special damages, according to proof on each cause of action for which such damages
6 are available.

7 3. For compensatory damages, including emotional distress damages, according to proof on
8 each cause of action for which such damages are available.

9 4. For punitive damages, according to proof on each cause of action for which such damages
10 are available.

11 5. For temporary and permanent injunctive relief, including reinstatement pursuant to
12 California Labor Code section 1102.62 and other relief to ensure that wrongful conduct is deterred in the
13 future.

14 6. For prejudgment interest and post-judgment interest according to law.

15 7. For reasonable attorneys' fees incurred in this action pursuant to the FEHA, California
16 Labor Code section 1102.5, and California Code of Civil Procedure section 1021.5.

17 8. For costs of suit incurred in this action.

18 9. For such other and further relief that the Court deems proper and just.

19 Dated: October 18, 2022

RISE LAW FIRM, P.C.

20 By: 
21 _____

22 ELIOT J. RUSHOVICH
23 LISA M. WATANABE-PEAGLER
24 ELISSA A. WAIZMAN

25 Attorneys for Plaintiff LISA RAAGAS
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Dated: October 18, 2022

By:

ELIOT J. RUSHOVICH
LISA M. WATANABE-PEAGLER
ELISSA A. WAIZMAN

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

EXHIBIT A



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
www.dfeh.ca.gov | contact.center@dfeh.ca.gov

October 17, 2022

Eliot Rushovich
8383 Wilshire Boulevard, Suite 800
Beverly Hills, CA 90211

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202210-18586717
Right to Sue: Raagas / Skid Row Housing Trust et al.

Dear Eliot Rushovich:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
www.dfeh.ca.gov | contact.center@dfefh.ca.gov

October 17, 2022

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202210-18586717

Right to Sue: Raagas / Skid Row Housing Trust et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD)) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

This matter may qualify for CRD's Small Employer Family Leave Mediation Pilot Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@dfefh.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,



Civil Rights Department

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
www.dfeh.ca.gov | contact.center@dfec.ca.gov

Civil Rights Department



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
www.dfeh.ca.gov | contact.center@dfec.ca.gov

October 17, 2022

Lisa Raagas

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202210-18586717
Right to Sue: Raagas / Skid Row Housing Trust et al.

Dear Lisa Raagas:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 17, 2022 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

This matter may qualify for CRD's Small Employer Family Leave Mediation Pilot Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@dfec.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

KEVIN KISH, DIRECTOR

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www.dfeh.ca.gov | contact.center@dfeh.ca.gov

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Lisa Raagas

CRD No. 202210-18586717

Complainant,

vs.

Skid Row Housing Trust
1317 E. 7th Street
Los Angeles, CA 90021

Patrick Spillane

,

Respondents

1. Respondent **Skid Row Housing Trust** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **Patrick Spillane** individual as Co-Respondent(s).

3. Complainant **Lisa Raagas**, resides in the City of , State of .

4. Complainant alleges that on or about **March 21, 2022**, respondent took the following adverse actions:

Complainant was harassed because of complainant's sex/gender, sexual harassment-hostile environment.

Complainant was discriminated against because of complainant's sex/gender, sexual harassment-hostile environment and as a result of the discrimination was terminated, other.

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment and as a result was terminated, other.

Additional Complaint Details: Complainant was employed by Respondent until on or around March 21, 2022. She was treated differently and wrongfully terminated because of her gender and/or her complaints about gender/sex discrimination and hostile work environment. She was also subject to a hostile work environment caused by one or more members of the Board of the Trust, including Patrick Spillane. Mr. Spillane would regularly make sexual and/or chauvinist comments in front of Raagas and others and otherwise treat Raagas and other females worse than their male colleagues.

1 VERIFICATION

2 I, **Eliot Rushovich**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On October 17, 2022, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **Laguna Hills, CA**
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